

K R A S K I N, L E S S E & C O S S O N, L L C
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

FILED ELECTRONICALLY

March 4, 2004

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
Office of the Secretary
445 Twelfth St, SW
Washington, DC 20554

Re: Domestic Section 214 Application for Transfer of
Control of the Conrad, Eldora, And Steamboat Rock
(Iowa) Exchanges
WC Docket No. 03-249

Heart of Iowa Communications Cooperative and Iowa
Telecommunications Services, Inc., d/b/a Iowa
Telecom Petition for Waiver of the Study Area
Boundary Freeze as Codified in Part 36 and
Waivers of Sections 69.3(e)(11) And 69.605(c) of the
Commission's Rules
CC Docket No. 96-45

Dear Ms. Dortch:

Heart of Iowa Communications Cooperative and Iowa Telecommunications Service, Inc.
(together, "Petitioners"), by their attorneys, hereby supplement the record in the above-referenced
dockets.

Petitioners attach the February 27, 2004, letter of the National Exchange Carrier Association
(NECA), in which it expresses that it has no objection to inclusion of the acquired ILEC access lines in
the NECA common line tariff.

WC Docket No. 03-249
CC Docket No. 96-45
Supplement, March 4, 2004

Please do not hesitate to contact the undersigned with any questions related to this submission.

Respectfully submitted,

/s/

David Cosson
Clifford C. Rohde
Counsel for Heart of Iowa Communications Cooperative

Enclosure

cc (via email): Qualex International (qualexint@aol.com)
 Tracey Wilson, Competition Policy Division, Wireline Competition Bureau
 (twilson@fcc.gov)
 Christi Shewman, Competition Policy Division, Wireline Competition Bureau
 (christi.shewman@fcc.gov)
 William Dever, Competition Policy Division, Wireline Competition Bureau
 (william.dever@fcc.gov)
 Christopher Killion, Office of General Counsel (ckillion@fcc.gov)
 Gary Seigel, Telecommunications Access Policy Division, Wireline Competition
 Bureau (gary.seigel@fcc.gov)
 Sheryl Todd, Telecommunications Access Policy Division, Wireline
 Competition Bureau (sheryl.todd@fcc.gov)



80 South Jefferson Road
Whippany, NJ 07981

Richard A. Askoff
Deputy General Counsel

Voice: 973-884-8350
Fax: 973-884-8008
E-mail: raskoff@neca.org

February 27, 2004

David Cosson, Esq.
Kraskin, Lesse & Cosson, LLC
2120 L. Street, N.W., Suite 520
Washington, D.C. 20037

Dear Mr. Cosson:

On November 26, 2003, Heart of Iowa Communications Cooperative ("Heart of Iowa"), and Iowa Telecommunications Services, Inc. ("Iowa Telecom") filed a Joint Petition for Expedited Waiver of Commission's "frozen study area" rule, in connection with the transfer of approximately 815 access lines in Iowa from Iowa Telecom to Heart of Iowa.¹ Additionally, Heart of Iowa also requested a waiver of the definition of "average schedule company" and the rules concerning participation in the National Exchange Carrier Association, Inc. ("NECA") common line tariff.

The waivers are necessary to (1) enable Iowa Telecom to delete these exchanges from its Iowa study area; (2) enable Heart of Iowa to incorporate these exchanges into its existing study area; (3) allow Heart of Iowa to report data associated with the acquired exchanges to NECA, thereby pooling these data, and bringing the exchanges under rate-of-return regulation; and (4) enable Heart of Iowa to continue to operate as an average schedule company with the newly acquired exchanges. Heart of Iowa also requests a waiver, to the extent that its common line tariff participation may be precluded until "the next annual access tariff filing effective date following consummation of the acquisition transaction."²

NECA has reviewed the Petition, and has no objection to inclusion of the acquired ILEC access lines in the NECA common line tariff. Inclusion of these acquired lines in NECA's tariff will create no undue administrative burden for NECA, nor will it result in any disadvantage to other tariff participants.

Upon approval of the Petition, Heart of Iowa apparently intends to discontinue its provision of competitive local exchange services and transfer its subscribers in Iowa Telecom's area to its

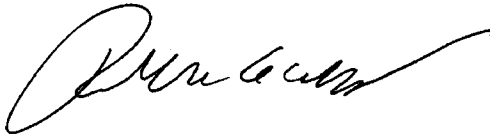
¹ See Heart of Iowa Communications Coop. et. al. *Joint Petition for Expedited Waiver*, CC Docket 96-45, filed November 26, 2003 (Petition).

² *Id.* at 13.

David Cosson, Esq.
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ILEC operation.³ The petition acknowledges the need to comply with Commission anti-slamming and customer notification rules. Additional clarification may be required following consummation of the transaction regarding the treatment of data associated with competitive local service operations in submissions used for purposes of calculating pool settlements and universal service support payments. NECA looks forward to working with Heart of Iowa, USAC and the Commission in clarifying reporting methods prior to the relevant submission dates.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Askoff", with a long, sweeping horizontal stroke extending to the right.

Richard A. Askoff

³ *Id.* at 4.